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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JENI PEARSONS, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA, et
al.,

Defendants.

No. 2:23-cv-07952-RGK-MAR

**STIPULATION TO SET BRIEFING
SCHEDULE ON MOTIONS TO
DISMISS**

Honorable R. Gary Klausner
United States District Judge

Counsel for plaintiffs Jeni Pearson and Michael Storc (“Plaintiffs”) and defendants United States of America (“United States”) and Lynne Zellhart (the United States and Lynne Zellhart are hereinafter collectively referred to as “Defendants”) hereby enter into the following stipulation to set the briefing schedule on Defendants’ anticipated motions to dismiss. The stipulation is based on the following:

1. Plaintiffs served their Complaint on defendant United States on October 16, 2023 and on defendant Lynne Zellhart on November 7, 2023.

2. The parties previously stipulated that Defendants shall have an additional thirty (30) days to respond to the Complaint such that the United States' deadline to respond to the Complaint shall be January 16, 2024 and Lynne Zellhart's deadline to respond to the Complaint is February 7, 2024.

3. The parties hereby stipulate to a consolidated briefing schedule to enable Defendants' anticipated motions to dismiss to be heard on the same schedule.

ACCORDINGLY, Plaintiffs and Defendants HEREBY STIPULATE THAT

(1) The United States and Zellhart's anticipated motions to dismiss shall be briefed

and heard on the following schedule, subject to Court approval:

- a. Motion Filing Deadline: January 16, 2024
- b. Plaintiffs' Opposition Deadline: February 6, 2024
- c. Reply Deadline: February 16, 2024
- d. Hearing: March 4, 2024 at 9:00 a.m.

Dated: December 13, 2023 Respectfully submitted,

INSTITUTE FOR JUSTICE

Joseph Gay*

Robert Frommer*

Robert E. Johnson*

THE VORA LAW FIRM, P.C.

Lou Egerton-Wiley

Nilay U. Vora
J. ff. Att. 1

Jeffrey Atteberry

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/s/ Joseph Gay
JOSEPH GAY

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Counsel for Plaintiff

Counsel for Plaintiffs
* Admitted *pro hac vice*

1 Dated: December 13, 2023

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6 */s/ Jasmin Yang*
7 JASMIN YANG
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9
10 Attorneys for the United States of America and
11 Lynne Zellhart

12 ATTESTATION UNDER LOCAL RULE 5-4.3.4

13 I, Jasmin Yang, am the ECF User whose ID and password are being used to file
14 this **STIPULATION TO SET BRIEFING SCHEDULE ON MOTIONS TO**
15 **DISMISS**. In compliance with Local Rule 5-4.3.4(a)(2), I hereby certify and attest that
16 Plaintiffs' counsel, Joseph Gay, has concurred in this filing.

17 DATED: December 13, 2023

18 */s/ Jasmin Yang*

19 JASMIN YANG
20 Assistant United States Attorney